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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Case No. 07-cv-05944 (SC)
MDL No. 1917

This Document Relates To:

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
Case No. C 13-1173 (SC);

Sharp Elecs. Corp. et al. v. Koninklijke Philips
Elecs. N.V. et al., No. 13-cv-2776-SC.

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF
SHARP'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RE MOTION IN
LIMINE NO. 10**

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel
3 for Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America,
4 Inc. (collectively, "Sharp"). I am a member of the bars of the State of Maryland, the State of New York,
5 and the District of Columbia, and I am admitted to practice before this court *pro hac vice*.

6 2. I submit this declaration in support of Sharp's Administrative Motion to File Documents
7 Under Seal. I have personal knowledge of the matters set forth herein and, if called as a witness, I could
8 and would testify competently to them.

9 3. Pursuant to Civil Local Rules 7-11 and 79-5, Sharp, by and through counsel, respectfully
10 requests an Order permitting it to file under seal portions of Sharp's Opposition to Joint Defense Motion
11 *In Limine* No. 10 – Motion to Exclude Evidence of Any Alleged CDT Price-Fixing Conspiracy
12 ("Sharp's Opposition to Joint Defense Motion In Limine No. 10"), filed contemporaneously herewith,
13 and Exhibits A-L of the Declaration of Craig A. Benson in Support of Sharp's Opposition to Joint
14 Defense Motion In Limine No. 10 ("Benson Declaration").

15 4. Attached as Exhibit A is a true and correct copy of a certified translation of the document
16 produced at CHU00031006, designated as Confidential by Chunghwa.

17 5. Attached as Exhibit B is a true and correct copy of a certified translation of the document
18 produced at CHU00021262E, designated as Confidential by Chunghwa.

19 6. Attached as Exhibit C is a true and correct copy of relevant excerpts from Volume I of the
20 Deposition of Chih Chun-Liu, dated February 19, 2013, designated as Highly Confidential by the
21 Toshiba defendants.

22 7. Attached as Exhibit D is a true and correct copy of a certified translation of the document
23 produced at Bates number HDP-CRT00025646, designated as Confidential by the Hitachi defendants.

24 8. Attached as Exhibit E is a true and correct copy of a certified translation of the document
25 produced at Bates number SDCRT-0086537, designated as Highly Confidential by the Samsung SDI
26 defendants.

1 9. Attached as Exhibit F is a true and correct copy of the document produced at Bates number
2 JIJ-00001899, designated as Confidential.

3 10. Attached as Exhibit G is a true and correct copy of the document produced at Bates number
4 PHLP-CRT-098241, designated as Confidential by the Philips defendants.

5 11. Attached as Exhibit H is a true and correct copy of a certified translation of the document
6 produced at Bates number SDCRT-0086487, designated as Highly Confidential by the Samsung SDI
7 defendants.

8 12. Attached as Exhibit I is a true and correct copy of the document produced at Bates number
9 PTC-00007637, designated as Confidential.

10 13. Attached as Exhibit J is a true and correct copy of a certified translation of the document
11 produced at Bates number MTPD-0400710, designated as Confidential by the Panasonic defendants.

12 14. Attached as Exhibit K is a true and correct copy of a certified translation of the document
13 produced at Bates number CHU00014218, designated as Confidential by Chunghwa.

14 15. Attached as Exhibit L is a true and correct copy of the document produced at Bates number
15 TCE-CRT 0013596, designated as Highly Confidential by the Thomson defendants.

16 16. Sharp's Opposition to Joint Defense Motion *In Limine* No. 10 and Exhibits A-L refer to or
17 contain excerpts from documents that producing parties have designated as "Confidential" or "Highly
18 Confidential" under the Stipulated Protective Order [Docket Nos. 306, 1142].

19 17. Accordingly, Sharp requests that the documents identified herein be filed under seal.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct.

22 Executed this 27th day of February, 2015, in Washington, DC.

23
24 /s/ Craig A. Benson
25 Craig A. Benson
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